

Comment No.	Section	Page	Comment	Tierra Response
1	Section 1.0 “Introduction”	Page 1, third paragraph	<p>(a) The Draft Combined Sewer Overflow/Storm Water Outfall (CSO/SWO) Reconnaissance Work Plan breaks the reconnaissance efforts into two phases and only addresses Phase I (office research). According to the Tierra schedule (dated January 24, 2017), Tierra should submit only one CSO/SWO Reconnaissance Work Plan and there is one scheduled EPA review of this planning document (refer to Rows 154-159 of the Tierra schedule). Office work to support the CSO/SWO reconnaissance, along with field program mobilization, are scheduled to start together on April 11, 2017 (Row 160-161) with the field work starting on May 9, 2017 (Row 162). Please prepare one complete CSO/SWO Work Plan that includes office work and field reconnaissance efforts. Also, please revise the third paragraph of Section 1.0 to address this comment. The revised WP may continue to refer to two phases within the reconnaissance effort; however, procedures required to carry out both phases should be included.</p> <p>(b) Please describe the anticipated field CSO/SWO reconnaissance efforts. According to the Tierra May 2002 Work Plan for the Lower Passaic River, a reconnaissance effort should include (but not be limited to): collection of physical information (including CSO chambers, dimensions, elevation, operational characteristics, and potential tidal intrusion), evaluation of sampling logistics, and consideration of available parking and traffic patterns.</p>	
2	Section 1.1 “Site Description”	Page 1, first paragraph	Please fully utilize previous work conducted and available information on the Newark Bay Study Area (NBSA) to make a preliminary identification of discharge points in the Work Plan. For example, publicly-owned treatment works (POTWs), CSOs, and SWOs in NBSA are documented in the “Report on Investigation of Sources of Pollutants and Contaminants” (Tierra, September 2006), particularly Section III. Please revise Section 1.1 (or add a new section) to summarize the findings of Section III of the September 2006 report. Please revise attached figure (or add new figures) showing the known discharge points (which are documented in Figures 3A through Figure 3J of the September 2006 report).	
3	Section 2.1 “Phases of NBSA CSO and Outfall Reconnaissance”	Page 2	Please note that the Focused Feasibility Study for the Lower Passaic River only contains information on the five CSOs sampled between RM3.9 and RM7.8, as well as the eight SWOs sampled between RM2.6 and RM11.1. If deemed necessary to provide more comprehensive references for Lower Passaic River CSOs/SWOs, please revise Section 2.1 to include other information sources.	
4	Section 2.1 “Phases of NBSA CSO and Outfall Reconnaissance”	Page 2	Section 2.1 states that “...a determination will be made by USEPA as to whether it is necessary to perform an in-field outfall verification (Phase II), and then later to collect...samples from select outfalls that discharge to the NBSA.” Please clarify the decision making process that is envisioned between EPA and Tierra to trigger Phase II of the reconnaissance and subsequent CSO/SWO sampling.	
5	Section 3.1 “Information Gathering”	Page 3	Please revise Section 3.1 to explain how the “Information Gathering” will also be used to identify and update/verify information on CSOs/SWOs that is available from previous Tierra documents.	

6	Section 3.1 “Information Gathering”	Table on Pages 4-5	<p>(a) Additional detail should be included in the table at the end of Section 3.1 to explain what information will be requested, for example:</p> <ul style="list-style-type: none"> <li>• “System network piping diagrams” - should include pipe sizes/shapes and structures (e.g., pump stations, storage tanks, treatment plants)</li> <li>• “Sewer system evaluation reports” - specify or give examples of the types of reports that will be requested.</li> <li>• “Reports detailing outfall performance” – please clarify this item and describe if it is to include reports submitted as part of permit conditions. (If permit compliance reports are not covered by this item, indicate where those reports are addressed in the information request.)</li> </ul> <p>(b) In the table rows designated as “CSO Related Information” (page 4), delete the duplicate entry for “Bypassing records for CSOs”, which is listed in both the 7<sup>th</sup> and 9<sup>th</sup> rows of table.</p>	
7	Section 3.2 “Summarizing Information”	Page 5	<p>(a) When documenting CSOs, please collect information on pipe elevation, and please prepare a map of CSO elevation in relationship to Mean Low Water during high tides and low tides to determine if the outfalls will be inundated and difficult to identify during the field reconnaissance.</p> <p>(b) The term “history” should be expanded to include the nature and extent of all documented permitted and non-permitted releases (such as chemical nature, volume, and duration of release) into the NBSA (both past and present).</p>	
8	Section 3.3 “Reporting”	Page 6	<p>(a) Prior to submitting the report, the field reconnaissance needs to be completed. Note that Section 3.3 states that information to be summarized includes “geographical coordinates, if known” and “physical conditions, if known.” This information can be obtained through a field reconnaissance.</p> <p>(b) In the first sentence of Section 3.3, please clarify the term “other information” (e.g., what other information does Tierra expect to acquire) or add a cross-reference to another section of the work plan to explain further.</p> <p>(c) In the last sentence of Section 3.3 regarding the map to be provided, please add call-out boxes with information on contribution (volume, duration, and chemicals present) of wastewater and storm water flows.</p>	
9	Table 2	Table 2	<p>Under “New York City Department of Environmental Protection”, please add two supporting links to Table 2 that include additional CSO and MS4 information. These supporting links are:  CSO’s <a href="http://www.nyc.gov/html/dep/html/stormwater/combined_sewer_overflow.shtml">http://www.nyc.gov/html/dep/html/stormwater/combined_sewer_overflow.shtml</a>  MS4’s <a href="http://www.nyc.gov/html/dep/html/stormwater/ms4.shtml">http://www.nyc.gov/html/dep/html/stormwater/ms4.shtml</a></p>	